

WOLTERS KLUWER HUMAN RIGHTS POLICY

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1 Introduction

Wolters Kluwer is an international company with a footprint in many countries around the world. The company is aware of the diversity in business cultures and practices around the world. Recognizing its responsibility to promote and protect human rights, Wolters Kluwer nv and its subsidiaries (hereinafter jointly referred to as “Wolters Kluwer”) commit to abide to the laws and regulations of the countries in which it is present.

Wolters Kluwer also wants its suppliers to uphold the standards set out in this policy wherever they are located.

Furthermore, all business activities are guided by the articles of the United Nations Universal Declaration of Human Rights, the eight core labor standards of the International Labor Organization (the eight ILO conventions which make up the core conventions are: conventions 87, 98, 100, 111, 29, 105, 138 and 182) and the principles of United Nations Global Compact, especially the principles 1 to 6.

2 Link with Wolters Kluwer Company Values and Business Principles

The Company Values are at the heart of the Company’s success and represent the common bond across all Wolters Kluwer businesses and employees. The Business Principles reflect the high ethical standards that are the basis for achieving the Company’s goals. Together, they are an important means to enable the Company and its employees to live up to high professional and ethical standards. The Business Principles state that Wolters Kluwer supports and respects responsible business behavior and it strives to ensure that its activities will not infringe upon them. The Wolters Kluwer Human Rights Policy is best seen as an expansion and articulation of this statement.

3 Wolters Kluwer Policy

The United Nations Universal Declaration of Human Rights, the core labor standards of the International Labor Organization and the principles of United Nations Global Compact are the fundament for this Human Rights Policy. Wolters Kluwer has further emphasized Human Rights issues which are most relevant for the Company.

Access to information

In its role as an information provider, Wolters Kluwer strives to assist in shaping the investment climate and public opinion of emerging economies where the Company has influence, by providing adequate knowledge on regulation, law, health and actual practice. Wolters Kluwer can improve access to information around the world by expanding its business in upcoming countries.

Freedom of publishing

Wolters Kluwer is aware of the fact that complete freedom of publishing is not self-evident in some parts of the world. Even if freedom of publishing is not fully secured, this is not a sufficient reason to stop providing information. While Wolters Kluwer cannot change such a situation, the Company can stimulate the distribution of information. Steps in the right direction can be made by working together with local partners.

Data protection

Wolters Kluwer needs to store and use personal data about customers to deliver appropriate service. The Company is committed to protecting the rights and privacy of past, present and prospective customers. Information about individuals must be collected and used fairly, stored safely and secure and only be disclosed in a way that is consistent with international best practices and applicable laws. Furthermore, the information will not be stored for longer than necessary.

Equal Opportunity

As a diverse, multinational company, Wolters Kluwer aims to create equal opportunities for all employees regardless of personal background, race, caste, gender, national or social background, marital status, age, physical or health condition, sexual orientation, membership of unions, political opinion, religion or any other personal characteristic or status. Wolters Kluwer will treat all individuals equal considering the responsibilities of their position during recruitment and selection, compensation and benefits and training, promotion, transfer or termination.

Harassment

Wolters Kluwer will not tolerate any form (physical or verbal) of sexual harassment, intimidation and discrimination on the basis of race, caste, gender, national or social background, marital status, age, physical or health condition, sexual orientation, membership of unions, political opinion, religion or any other personal characteristic or status.

Privacy of employees

Wolters Kluwer has the right to monitor the appropriate business use of its own internal information and communication systems. For this reason, Wolters Kluwer cannot guarantee the privacy of the information that employees insert in or exert out of the Company's systems or facilities. This applies to movements on the internet or e-mail, but also to phone and fax communications. Wolters Kluwer will always act in conformity with local laws and to the extent applicable agreements with employee representative bodies (works councils) with respect to this subject.

Freedom of Association

Wolters Kluwer respects the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference.

4 Supplier Principles

Wolters Kluwer expects all suppliers to adhere to local laws and regulations, to the articles of the United Nations Universal Declaration of Human Rights, the core standards of the International Labor Organization and the principles of United Nations Global Compact. Wolters Kluwer requires all its suppliers to sign the Wolters Kluwer Standards of Engagement for Suppliers. Human Rights standards that Wolters Kluwer suppliers have to meet at a minimum are:

- **Labor Conditions**

Suppliers shall operate in accordance with the United Nations Universal Declaration of Human Rights (UN UDHR), and the fundamental human rights and labor rights as articulated by the International Labor Organization (ILO).

- **Forced Labor**

Suppliers will not use forced, bonded, prison, military or compulsory labor.

- **Child Labor**

Suppliers will not use child labor, as defined by the International Labor Organization and the United Nations Global Compact, and shall adhere to all (supra-)national laws and regulations regarding child labor.

- **Abuse of Labor**

Suppliers will treat each employee with dignity and respect, and will not use, and procure that their directors and employees will not use, corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment, abuse or intimidation.

- **Freedom of Association**

Suppliers shall acknowledge the rights of workers to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference, in order to advance their interests. In countries where national law curtails workers' freedom of association and collective bargaining, suppliers shall support the development of similar efforts to achieve independent and free association, organization and bargaining.

- **Non-discrimination**

Suppliers shall treat and reward employees equally on the basis of the characteristics of their work and the intensity of their effort. Suppliers will not discriminate in hiring and employment practices on the basis of race, caste, gender, national or social background, marital status, age, physical or health condition, sexual orientation, membership of unions, political opinion, religion or any other personal characteristic or status.

- **Wages and Benefits**

Suppliers will comply with all applicable local and national wages and benefits laws and compensation for work shall fulfill at a minimum the strictest national legal standards, industrial standards and the standards of the ILO conventions.

- **Health and Safety**

Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable local and (supra-)national laws and regulations. In addition, all relevant collective bargaining agreements shall be respected.

Suppliers shall provide, while taking into account the specific dangers of the relevant sector, for safe, hygienic, and healthy working environments for their employees. Adequate measures shall be taken to prevent accidents and damage to workers' health which may arise from, are related to, or occur during working hours.

5 Scope

Wolters Kluwer is responsible and accountable for upholding Human Rights by monitoring Human Rights performance for:

- All Wolters Kluwer companies and business units worldwide
- To the extent possible Joint Ventures where Wolters Kluwer both owns 50 percent of the shares and also exerts full management control

Wolters Kluwer is responsible for assessing the Human Rights situation at the time a commitment is made and for continuously influencing situations that are unsatisfactory but Wolters Kluwer is not responsible and not accountable for the actions and practices thereafter for companies or joint ventures where Wolters Kluwer has a minority share or where it cannot exert management control.

Wolters Kluwer is responsible for assessing the Human Rights situation at the time a commitment is made and for random and non-random monitoring of Human Rights practices but Wolters Kluwer is not accountable for the actions and practices thereafter for all suppliers worldwide.

6 Responsibilities and Management

The Wolters Kluwer Executive Board attaches great importance to the implementation of this policy. All employees who want to report breaches or violations regarding the Wolters Kluwer Human Rights policy can take action according to the rules and procedures described in the Wolters Kluwer Whistleblower Policy.

Appendix I United Nations Universal Declaration on Human Rights

Preamble

Whereas recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world,

Whereas disregard and contempt for human rights have resulted in barbarous acts which have outraged the conscience of mankind, and the advent of a world in which human beings shall enjoy freedom of speech and belief and freedom from fear and want has been proclaimed as the highest aspiration of the common people,

Whereas it is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the rule of law,

Whereas it is essential to promote the development of friendly relations between nations,

Whereas the peoples of the United Nations have in the Charter reaffirmed their faith in fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women and have determined to promote social progress and better standards of life in larger freedom,

Whereas Member States have pledged themselves to achieve, in cooperation with the United Nations, the promotion of universal respect for and observance of human rights and fundamental freedoms,

Whereas a common understanding of these rights and freedoms is of the greatest importance for the full realization of this pledge,

Now, therefore THE GENERAL ASSEMBLY, proclaims THIS UNIVERSAL DECLARATION OF HUMAN RIGHTS as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance, both among the peoples of Member States themselves and among the peoples of territories under their jurisdiction.

Article 1

All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

Article 2

Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 3

Everyone has the right to life, liberty and security of person.

Article 4

No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Article 5

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 6

Everyone has the right to recognition everywhere as a person before the law.

Article 7

All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

Article 8

Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.

Article 9

No one shall be subjected to arbitrary arrest, detention or exile.

Article 10

Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

Article 11

Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense.

No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.

Article 12

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honor and reputation. Everyone has the right to the protection of the law against such interference or attacks.

Article 13

Everyone has the right to freedom of movement and residence within the borders of each State.

Everyone has the right to leave any country, including his own, and to return to his country.

Article 14

Everyone has the right to seek and to enjoy in other countries asylum from persecution.

This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.

Article 15

Everyone has the right to a nationality. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

Article 16

Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.

Appendix II ILO Core Labor Standards

Core labor standards are inalienable rights, which all workers should enjoy by virtue of being human beings. The International Labor Organization (ILO) defines these standards as including such basic tenets such as freedom of association, the elimination of all forms of forced or compulsory labor, the abolition of the most hazardous forms of child labor, and the elimination of discrimination in respect of employment and occupation. Unfortunately, many of these rights are not respected in many parts of the world, resulting in gross injustices against vulnerable people.

Respect for core labor standards does not imply uniform labor conditions across developed and developing states. This position would be fiercely opposed by developing states seeking to operate in an increasingly competitive market. Rather, it is a minimal level below which no one should sink. It represents a belief that globalization must work for the whole society, and that governments should not compete away the basic rights of their workers, in their search to attract inward investment.

More than 140 countries meeting at the ILO in 1998 re-affirmed their commitment to core labor standards. The eight ILO conventions which make up the core conventions are:

1 Convention 87 - Freedom of Association and Protection of the Right to Organize (1948)

C87 protects the right of workers to join and form independent trade unions. This right is absolute and trade unionists are entitled to be free from any interference from the state. C87 expressly forbids the state to impose sanctions upon workers for organizing unions.

The ILO's Committee of Independent Experts has repeatedly ruled that C87 also protects the right of workers to defend their economic and social interests by measures up to and including strike action. The ILO considers that freedom of association is so important that it has a special committee on Freedom of Association which considers complaints made by any trade union or trade union federation and publishes reports of the cases it investigates. These reports can be purchased (but it is necessary to know the complaint number) or consulted at the ILO office in London. The leading decisions of this Committee and the Committee of Experts on Freedom of Association matters are neatly summarized by subject in a very useful ILO book 'Freedom of Association' which sets out the guiding principles of how the relevant Conventions (numbers 87 and 98 - see below) must operate in practice.

2 Convention 98 - Right to Organize and Collective Bargaining (1949)

C98 provides that workers are allowed to organize their union activities without threat of dismissal or action short of dismissal by their employers or by the state. C98 also protects workers' right to promote their interests by means of collective bargaining.

The convention places a duty on states to promote collective bargaining.

3 Convention 100 - Equal Remuneration

C100 requires states to put in place machinery to ensure the application of the principle of 'equal remuneration for men and women for work of equal value'.

4 Convention 111 - Discrimination in Employment

C111 requires states to declare and pursue a policy to promote equality of opportunity and 'eliminate discrimination on the grounds of: race, color, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment'.

5 Convention 29 - Forced Labor

C29 requires states to take such measures to suppress all forms of forced or compulsory labor within the shortest possible timescale. The convention defines forced labor as 'all work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily'.

However, specifically excluded from the terms of C29 are: compulsory military service, ‘normal civic obligations’, work or service extracted as a result of a conviction in a court of law (but only in so far as the work is supervised by a public authority and not at the disposal of a private company), work required by the state in cases of emergency (several examples are listed). The Convention further states that no private company or individual should be permitted to profit or benefit from the imposition of forced labor or the product of that labor.

6 Convention 105 - Abolition of Forced Labor

C105 requires signatory states to ‘not to make use of any form of forced or compulsory labor’ as a means of:

- Political coercion, education or punishment for holding political or ideological views opposed to the established political or social system
- Ensuring economic development
- Labor discipline
- Punishment for strikes
- Racial, social, national or religious discrimination

7 Convention 138 - Minimum Age

C138 requires that states seek to end child labor and requires that the minimum age for entry into employment must be no lower than the age of compulsory schooling, and in no case may this be lower than 15 years.

States are entitled to lower this age to 14 years, but those choosing to do so must explain their reasons to the ILO conference every year that the lower age is maintained. C138 also specifies a minimum age of 18 years for occupations which may jeopardize the health, safety or morals of a young person.

8 Convention 182 - Worst Forms of Child Labor

The General Conference of the International Labor Organization considers that the effective elimination of the worst forms of child labor requires immediate and comprehensive action, taking into account the importance of free basic education and the need to remove the children concerned from all such work and to provide for their rehabilitation and social integration while addressing the needs of their families.

The ILO recognizes that child labor is to a great extent caused by poverty and that the long-term solution lies in sustained economic growth leading to social progress, in particular poverty alleviation and universal education.

For the purposes of this Convention, the term “child” applies to all persons under the age of 18 and the term the “worst forms of child labor” comprises:

1. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
2. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
3. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
4. work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Articles 5 to 10 of the Convention outline the implementation and monitoring mechanisms. For example, each Member should take into account the importance of education in eliminating child labor, and take effective and time-bound measures to:

- prevent the engagement of children in the worst forms of child labor;
- provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labor and for their rehabilitation and social integration;
- ensure access to free basic education, and, wherever possible and appropriate, vocational training, for all children removed from the worst forms of child labor;
- identify and reach out to children at special risk; and
- take account of the special situation of girls.

So C182 commits states to put into place a wide range of measures to ‘combat child labor now!’ (ILO slogan). However, it is also true that the Convention shall be binding only upon those Members of the International Labor Organization whose ratifications have been registered with the Director-General of the International Labor Office.

Appendix III United Nations Global Compact

The UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption enjoy universal consensus and are derived from:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption:

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.